

Exhibit A

From: Crowley, Shawn (USANYS) <Shawn.Crowley@usdoj.gov>
Sent: Monday, July 13, 2020 11:28 AM
To: Heberlig, Brian
Cc: Bove, Emil (USANYS)
Subject: U.S. v. Sadr, 18 Cr. 224 (AJN) -- July 8 order

Brian,

We wanted to let you know our position with respect to Judge Nathan's July 8, 2020 order.

The Government does not object to the Court relying on Rule 33 as the procedural basis for vacatur of the jury's verdict and thus, without conceding any of the specific arguments advanced by the defendant and while the Government does not believe any of the attorneys assigned to this case acted in bad faith or intentionally withheld exculpatory information for the reasons already explained, the Government consents to the Court granting Mr. Sadr's Rule 33 motion prior to or in connection with the issuance of the *nolle* order.

Thank you,

Shawn G. Crowley
Co-Chief, Terrorism and International Narcotics Unit
United States Attorney's Office
Southern District of New York
212-637-1034 (o)
[REDACTED] (c)